

**FILED**09-26-06  
03:41 PM

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

Pacific Gas and Electric Company (U 39-E), for  
Approval of the 2006 – 2008 Energy Efficiency  
Programs and Budget.

Application 05-06-004  
(Filed June 1, 2005)

Southern California Gas Company (U 904-G), for  
Approval of Natural Gas Energy Efficiency  
Programs and Budgets for Years 2006 through  
2008.

Application 05-06-011  
(Filed June 1 2005)

Southern California Edison Company (U 338-E),  
for Approval of its 2006 – 2008 Energy  
Efficiency Program Plans and associated Public  
Goods Charge (PGC) and Procurement Funding  
Requests.

Application 05-06-015  
(Filed June 2, 2005)

San Diego Gas & Electric Company (U 902-E),  
for Approval of Electric and Natural Gas Energy  
Efficiency Programs and Budgets for Years 2006  
through 2008.

Application 05-06-016  
(Filed June 2, 2005)

**SOUTHERN CALIFORNIA EDISON COMPANY'S REPLY COMMENTS ON THE  
AUGUST 21, 2006 ADMINISTRATIVE LAW JUDGE'S RULING SEEKING FURTHER  
INFORMATION**

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Dated: **September 26, 2006**

**SOUTHERN CALIFORNIA EDISON COMPANY'S REPLY COMMENTS ON THE AUGUST  
21, 2006 ADMINISTRATIVE LAW JUDGE'S RULING SEEKING FURTHER INFORMATION**

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**I.**

**INTRODUCTION**

Pursuant to the permission of the Administrative Law Judge Gamson,<sup>1</sup> and in accordance with Rule 47 of the Rules of Practice and Procedure of the California Public Utilities Commission (the Commission), Southern California Edison Company (SCE) respectfully files these reply comments on the September 19, 2006 Response of the Division of Ratepayers Advocates (DRA) and The Utility

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<sup>1</sup> On September 19, 2006, SCE sent an e-mail to ALJ Gamson requesting leave to file a reply to parties' responses to SCE's September 5 Response. On September 20, 2006, ALJ Gamson replied to the e-mail request, granting permission for SCE to file this reply by September 26, 2006.

Reform Network (TURN) and the Response of the Government Partners to SCE's September 5, 2006 Response to the August 21, 2006 ALJ Ruling Seeking Further Information. SCE's reply to DRA and TURN is structured to correspond to the original question posed by the ALJ in his August 21, 2006 Ruling.

## II.

### **REPLY TO THE DRA/TURN COMMENTS**

**A. Question 1: How will the projected savings change given that the program cannot ramp up for the summer 2006? Additionally, how will this change in schedule impact the proposed budget?**

DRA and TURN criticize SCE for not proposing to change the Demonstration Project's goals and budget due to the delay in obtaining program approval.<sup>2</sup> To date, the Demonstration Project has missed out on 6 months of a proposed 30 month program. This delay should not materially impact on the partners' ability to deliver the program as proposed. As SCE explained, delayed starts of several months are not uncommon in energy efficiency programs, and from experience have not generally impeded SCE's ability to deliver the projected savings. However, should the Commission determine that an adjustment to the proposed goals and budget is warranted, then SCE requests that the Commission direct SCE to file an updated Program Implementation Plan or an advice letter making such adjustments.

DRA/TURN assert that SCE will not be able to achieve the Demonstration Project's energy savings or demand reductions based upon the accomplishments to date in SCE's 2006-8 portfolio.<sup>3</sup> SCE disagrees. SCE's 2006 accomplishments to date reflect the installations resulting from the ramp-up of SCE's 2006-8 portfolio. SCE's 2006 portfolio was never expected to reach the year-end projected energy and demand savings early in the year. The slower than usual rate of accomplishments in SCE's

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<sup>2</sup> See Response of The Division Of Ratepayer Advocates and The Utility Reform Network (DRA/TURN) to Southern California Edison Company's Response To ALJ Gamson's Questions And Amendment To Previously Filed DRA/TURN Joint Response To Petition For Modification, September 19, 2006 at p.3.

<sup>3</sup> See *id.*

portfolio are the result of the following well-known facts with the 2006-8 portfolios: (1) the change to the accounting of energy efficiency energy savings and demand reduction results; (2) the extensive 2006-8 program start-up process; and (3) the delayed final approval of 2006-8 programs.

First, as to the accounting issue, over the past several years, the Commission recorded energy efficiency program results when energy savings were either installed or committed to be installed. Beginning 2006, the Commission has changed this accounting scheme to only record installed energy savings towards the goal.<sup>4</sup> The Commission recognized that this accounting change will have an adverse affect on utilities' ability to achieve Commission targets in the near-term as indicated in an ACR, dated May 11, 2005.

“...changing the accounting to “actuals only” will materially affect the ability of program administrators to reach near term annual savings goals (particularly in 2006 and 2007), since they can no longer count the installations and associated savings from pre-2006 commitments as part of their program achievements. This is a short-term transition issue, and not a long-term problem, because commitments made in 2006 and 2007 for both retrofits and new construction programs will become “actuals” in the program years that follow, thereby assisting in the achievement of the adopted cumulative goals for later years.”<sup>5</sup>

Second, the Commission has required a significant portion -- 20% -- of the utilities' program portfolio to open to competitive bid. In fact, SCE's adopted program portfolio has an even greater portion -- 35% -- allotted to a competitive bid process not including the many new partnerships SCE has formed. The time required to ramp-up each program following approval in April 2006 can be considerable, based on the complexity of the program design and the extent of collaboration needed among the program implementer and SCE as administrator.

For example, a very important and ambitious program SCE will administer is the statewide Comprehensive Packaged Air Conditioning (“CPAC”) program. The CPAC program has a number of new strategies (*e.g.*, quality installation, training, contractor incentives) with a number of subcontractors

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<sup>4</sup> See D.04-090-060 at p. 33.

<sup>5</sup> See *id.* at p. 7.

assisting with the implementation. The utilities and the program implementers have been working together, along with key stakeholders, to ensure program success, not only for the current program cycle, but for the longer term. However, this CPAC program became operational on August 1, 2006, and is not expected to be fully operational until early 2007. This accounts for the current level of HVAC related savings achieved to date by SCE's portfolio. It is not because SCE has declined to pursue such savings, as DRA/TURN allege. Other less complex competitively bid programs will be implemented sooner, but SCE does not expect a fully implemented portfolio until some period in 2007.

Finally, SCE had expected to have full Commission approval of its 2006-8 program portfolio by early February 2006, however it was not received until late April 2006, which further delayed program ramp-up.

**B. Question 2: What portion of the project demand savings does the Thermal Energy Storage (TES) represent? Does TES require more energy usage? Please provide supporting documentation showing energy usage vs. demand reduction due to this technology. Please provide preliminary independent test findings that TES is an energy efficient measure in addition to its load shifting capabilities.**

DRA/TURN's comments wrongly imply that SCE attempted to offer the ASHRAE articles as independent scientific studies of TES.<sup>6</sup> SCE offered these articles as "supporting documentation" showing the energy usage vs. demand reduction of the technology, as requested by the ALJ. SCE expressly stated that it was unaware of any preliminary independent test findings that TES is an energy efficient measure in addition to its load-shifting capabilities. SCE acknowledged that TES may or may not require more energy usage, depending on the application.<sup>7</sup>

DRA/TURN argue that TES does not belong in the Energy Efficiency (EE) proceeding, and is "more appropriately" considered in the Demand Response (DR) proceeding.<sup>8</sup> Curiously, in a recent

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<sup>6</sup> See Response of DRA/TURN at p.4.

<sup>7</sup> See Response of SCE at p.3-4.

<sup>8</sup> See DRA/TURN Response at 6-7.



filing in the Demand Response proceeding, TURN argued that TES is not demand response because it is not dispatchable, and therefore it should *not* be considered in the DR proceeding, but rather in the EE proceeding.<sup>9</sup> TURN's contradictory position on this issue is troubling, and suggests that TURN is dismissive of a technology that could provide a viable alternative to the current standard methods for air conditioning. SCE maintains that Palm Desert provides the right customer market to test TES, on a pilot basis, as an energy efficiency measure that achieves permanent peak load reduction.

**C. Question 5: What other related programs (utility and non-utility) are currently operating in Palm Desert and how will these other programs coordinate with the Palm Desert partnership program.**

In SCE's September 5 response to this question, SCE explained how SCE's various energy efficiency programs operating in Palm Desert will coordinate with the Demonstration Project. In response, DRA/TURN complain that SCE's claim to the uniqueness of the Demonstration Project "boils down to . . . early retirement and TES."<sup>10</sup> While early retirement and TES are important components of the program, DRA/TURN overlook the main point that the *approach to delivering all the energy efficiency measures to Palm Desert customers, supported by the aggressive goals of the program and the unprecedented commitment of the City of Palm Desert to achieve those goals, are what make the proposed Demonstration Project unique.* In addition, the design, development and sustainability of the Demonstration Project is intended to act as a model for the achievement of very aggressive energy savings goals, which communities throughout California will be able to use when planning and executing their own local energy efficiency activities.

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<sup>9</sup> See TURN Comments on the Utility Proposals to Augment 2007 Demand Response Programs and Budgets, filed September 15, 2006 in A.05-06-006 *et al.* (the DR proceeding), stating that permanent load shifting technologies like TES are "not demand response and should not be evaluated in this [DR] proceeding because it only adds to the confusion. . . . it would be a mistake to value [permanent load shifting technologies like TES] as if they were a dispatchable form of capacity (i.e., demand response or reliability programs) because they are not a dispatchable form of capacity. This is not to say that they should not be pursued or rewarded. . . . If they save energy as well as capacity, then they could qualify for energy efficiency incentives and should be evaluated in that forum. The Commission should also consider evaluating [such technologies] in the energy efficiency proceeding."

<sup>10</sup> See *id.*

SCE also clarifies that, contrary to DRA/TURN's assertion,<sup>11</sup> SCE does not have an early retirement component in its current HVAC program. One is being considered. In 2005, SCE conducted a small, early retirement trial program in the San Bernardino and Coachella Valley areas. Called the "AC Energy Hog Round-up," this program attracted approximately 100 participants. In the process, SCE learned a great deal about implementing early retirement, and intends to apply the lessons learned to the Demonstration Project. For example, the trial program demonstrated that (i) targeting older central A/C units for early replacement is effective through contractor referrals; ii) the energy savings potential was greater than what was initially expected; and iii) that customers were willing to participate in early retirement when presented with adequate information and program support.

**D. Questions 6 and 7: Please provide information on initial budgets proposed by the other local government partnerships for the 2006-2008 program cycle, the final budgets that were agreed upon and reflected in the contracts between these other partnership programs and SCE, and the reasons for why the respective budgets were increased or decreased from the initial proposed budgets.**

SCE interpreted this question as requesting information on the budgets proposed by the *partnerships*, hence the budgets *agreed to by the partners* to the various partnerships. However, SCE agrees that it should have provided the initial budgets, if any, proposed by the various local partners in response to this question. SCE provides such data below. The difference in the funding levels of the partnerships programs, including the proposed Demonstration Project, is due to the expected energy and demand savings results of each program. With the Demonstration Project, SCE expects to achieve over 40.2 million kWh and over 12.3 megawatts with the requested \$18.8 million.

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<sup>11</sup> See DRA/TURN Response at p. 7.

**Table II-1**

2006-2008 Local Gov't Partnerships	Local Partner Proposed Budget	Compliance Filing Budget	Current Budget		Change to Budget from Compliance Filing to Current Budget	2006-08 Goals		Reason for increase or decrease
			Current Contracted Amount	Planned Budget Amount		kWh	kW	
Local Government Energy Action Resources <sup>1)</sup>	N/A [2]	\$ 5,420,032	N/A	\$ 1,427,911	\$ (3,992,121)	8,385,475	1,767	Funds were shifted to new and existing partnerships (e.g. DGS)
Mammoth Lakes Partnership Program	N/A [2]	\$ -	\$ 300,000	\$ 300,000	\$ 300,000	-	-	New program
Ridgecrest Partnership Program	N/A [2]	\$ -	\$ 300,000	\$ 300,000	\$ 300,000	-	-	New program
Ventura County Partnership	\$ 7,200,000	\$ 2,201,099	\$ 2,299,168	\$ 2,299,168	\$ 88,069	5,700,000	1,236	Adjustment in allocated SCE cost
South Bay Partnership	\$ 2,490,260	\$ 1,390,167	\$ 1,390,167	\$ 1,390,167	\$ (9)	-	-	Adjustment in allocated SCE cost
Bakersfield and Kern County Partnership	N/A [2]	\$ 1,737,709	\$ 1,694,256	\$ 1,694,256	\$ (43,453)	3,507,868	457	Adjustment in allocated SCE cost
Santa Barbara Region Partnership Program	N/A [2]	\$ 347,543	\$ 347,543	\$ 347,543	\$ 0	-	-	Adjustment in allocated SCE cost
Community Energy Partnership (Non-Resource)	\$ 4,800,000	\$ 4,633,891	\$ 4,633,889	\$ 4,633,889	\$ (1)	-	-	Adjustment in allocated SCE cost
Community Energy Partnership (Resource)	\$ 2,400,000	\$ 2,316,943	\$ 2,316,945	\$ 2,316,945	\$ 2	6,604,854	687	Adjustment in allocated SCE cost
San Gabriel Valley EE Partnership Program	\$ 3,000,000	\$ 1,737,709	\$ 1,724,868	\$ 1,724,868	\$ (12,841)	2,701,362	840	Adjustment in allocated SCE cost
Department of General Services Partnership	In Negotiations	\$ -	\$ -	\$ 4,351,325	\$ 4,351,325	TBD	TBD	New program
California Community Colleges	\$ 9,000,000	\$ 8,985,167	\$ 8,985,167	\$ 8,985,167	\$ -	24,425,594	5,146	No change in budget
California Department of Corrections and Rehabilitation	\$ 6,000,000	\$ 2,898,675	\$ 2,898,675	\$ 2,898,675	\$ -	8,912,010	1,456	No change in budget
SCE-SCG County of Los Angeles Partnership	\$ 10,000,000	\$ 4,743,598	\$ 4,742,598	\$ 4,742,598	\$ (1,000)	12,337,280	2,599	Adjustment in allocated SCE cost
County of Riverside Partnership	\$ 2,000,000	\$ 995,550	\$ 995,550	\$ 995,550	\$ -	2,595,400	547	No change in budget
UC-CSU-FC&E-SCE-SCG-SDG&E Partnership	\$ 6,900,000	\$ 6,830,972	\$ 6,830,972	\$ 6,830,972	\$ -	17,440,800	3,674	No change in budget

<sup>1)</sup> LGEAR is set aside to supplement existing partnerships depending on performance and/or fund new partnerships

<sup>2)</sup> N/A - The local partner did not propose a budget.

**E. Question 8: Please provide a comparison of Palm Desert energy usage and usage per household to the other similar communities and customers within SCE's service territory (e.g., Palm Springs).**

DRA/TURN assert that the usage per household data SCE provided shows no significant variation between the communities, and once again question "why Palm Desert." As SCE has explained in it previous filings and herein, the City of Palm Desert has made several unique commitments to achieving energy efficiency which no other local government has yet been willing to seriously consider. The City of Palm Desert has agreed to commit to a *city-wide* reduction in demand and energy consumption by 30% over 2005 baselines. The City of Palm Desert is willing to make *significant financial commitments* to achieve this goal, in the form of enhanced energy efficiency practices and requirements, reduced permit fees, a new created Office of Energy Management, and advertising, promotions and other in-kind contributions. The City's ambitious goals for energy efficiency serve as an important precedent for other California communities that may be interested in implementing aggressive energy efficiency goals.

**F. Question 9: Please clarify whether SCE used a Net-To-Gross ratio of 1.0 for all measures in this partnership program. If so, what is the rationale for not limiting the use of this ratio to the HVAC early retirement?**

In its September 5 response to this question, SCE explained that it did not limit the application of the 1.0 Net-To-Gross (NTG) to the HVAC early retirement measure because the NTG is applied at a program level, not the measure level. SCE explained that its rationale for using the 1.0 NTG: the energy savings and demand reductions achieved through this program are expected to be above and beyond the results from any other programs offered to these customers. SCE assumes that in the absence of the Demonstration Project, the customers would not take the actions necessary to achieve the incremental energy and demand savings targeted by the Demonstration Project. Under this assumption, there are no free-riders in this program and the NTG ratio should be set at 1.0.

In their response, DRA/TURN argue that SCE is *required* to use a default 0.8 NTG for the Demonstration Project by the Commission's Energy Efficiency Policy Manual (Version 2). The Energy Efficiency Policy Manual (Version 2) states that "if a proposed program design deviates substantially from past design of related programs, the program proposal *may* utilize a NTGR of 0.8 until such time as a new, more appropriate, value is determined in the course of program evaluation." SCE does not read this provision as requiring the use of a 0.8 NTG ratio, but rather permitting such use. However, SCE points out that the Demonstration Project is still cost effective using a 0.8 NTG, at a TRC of 1.29 and a PAC of 1.33, as shown below:

***Table II-2***

Cost Effectiveness (Lifecycle Present Value Dollars)							
	Cost	Benefits			Benefit - Cost		Notes
		Electric	Gas	Incentives	NPV	B/C Ratio	
Program TRC (\$)	\$ 18,238,511	\$23,484,467	\$0	NA	\$5,245,956	1.29	*1
Program PAC (\$)	\$ 17,657,870	\$23,484,467	\$0	NA	\$5,826,597	1.33	*1,2
Program RIM (\$)	\$ 48,516,197	\$23,484,467	\$0	NA	(\$25,031,730)	0.48	*1

\*1 B/C Ratio is an approximation because any supply cost increases are treated as negative benefits rather than as a cost as in the Standard Practice Manual.

\*2 PAC benefits include environmental costs. This is to be consistent with the TRC benefits, but is not strictly consistent with the Standard Practice Manual.

**G. Question 11: Please recalculate the TRC correcting for the IMC issue as raised by DRA/TURN.**

SCE attaches hereto as **Attachment A** the input and output sheets from the revised E3 calculator for the Demonstration Project.

**H. Question 12: Please clarify the assignment of roles and responsibilities of The Energy Coalition, City of Palm Desert, and SCE with regards to this partnership program. Specifically, how will The Energy Coalition assist SCE and the City of Palm Desert to "bring energy efficiency offerings to communities using partnership principles"? What exactly are these principles? What type of facilitation and coordination will The Energy Coalition provide?**

In their response, DRA/TURN make a misleading characterization of the funding of the Community Energy Partnership (CEP). The CEP is currently implemented in 10 cities in Southern California, one of which is Palm Desert. Since CEP was successfully implemented in 2004 and 2005, CEP was again funded for implementation in 2006-8. The Commission's authorization of funding for CEP is specifically for (i) the implementation of the CEP Direct Install and Outreach Programs ("resource" funds of \$2 million); and (ii) the PEAK ("non resource" funds of \$4 million) community and school educational programs. The entire \$6 million of funding, including the \$4 million of non-resource funding cited by DRA/TURN as "discretionary", is not discretionary at all, but is dedicated to specific program activities (deliverables).

The Palm Desert Demonstration Project is entirely different from the CEP. The Demonstration Project is designed to dramatically reduce energy use citywide by 30% -- an approach that has never been proposed or achieved before. The design, development and sustainability of a program of this magnitude is intended to act as a model for the achievement of a very aggressive energy savings goal. Because of its unique and aggressive goals, the Demonstration Project will require extraordinary effort, creative thinking, strong implementation and the utilization of new technology, which the partners are well-positioned and ready to contribute.

### III.

#### **REPLY TO THE GOVERNMENT PARTNERS' COMMENTS**

The Comments of the Government Partners appropriately point out the timing difference in the reporting of impacts of the partnership programs in SCE's energy efficiency annual report and what the final impacts of these programs may show in the final measurement studies.<sup>12</sup> SCE generally uses its publicly filed Energy Efficiency Annual Report as the primary source of reported energy savings and demand reduction impacts from all of its programs, including partnership programs, resulting from a particular program year. This provides an apples-to-apples comparison of the impacts of all of SCE's programs at a given point in time.

SCE clarifies that the 2005 Energy Efficiency Annual Report, which included data as of December 31, 2005, was the source of the information provided in SCE's September 5, 2006 response. Since the development of that report, there have been draft or final measurement reports completed on the partnerships, including those listed in the Comments of the Government Partners.

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<sup>12</sup> See Response of The Government Partners to Southern California Edison Company's Response to Administrative Law Judge's Ruling Seeking Further Information at p.1.

IV.

**CONCLUSION**

SCE appreciates the opportunity to file these reply comments.

Respectfully submitted,

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**September 26, 2006**

**ATTACHMENT A**

**REVISED E3 CALCULATOR INPUT AND OUTPUT SHEETS**



**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S REPLY COMMENTS ON THE AUGUST 21, 2006 ADMINISTRATIVE LAW JUDGE'S RULING SEEKING FURTHER INFORMATION on all parties identified on the attached service list(s).

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **26th day of September, 2006**, at Rosemead, California.

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Tuesday, September 26, 2006

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Tuesday, September 26, 2006

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Tuesday, September 26, 2006

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Tuesday, September 26, 2006

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